

1 The Honorable Barbara J. Rothstein
2
3
4
5
6
7
8

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 MICHAEL BROCK, et al., Plaintiffs,
10 v.
11 CITY OF BELLINGHAM AND
12 MAYOR SETH FLEETWOOD,
13 Defendants.

CASE NO. 2:24-cv-00850-BJR

**STIPULATED MOTION AND ORDER
FOR OVERLENGTH BRIEFING ON
DEFENDANTS' MOTION TO
DISMISS**

NOTED FOR CONSIDERATION:
Friday, August 9, 2024

15
16 Plaintiffs Michael Brock, et al. ("Plaintiffs"), and Defendants City of Bellingham and
17 former Mayor Seth Fleetwood (collectively, "Defendants," and together with Plaintiffs, the
18 "Parties"), by and through their respective undersigned counsel, stipulate and agree as follows:

19 1. Defendants intend to file a motion to dismiss in this matter.

20 2. Given the number and nature of claims presented by Plaintiffs, the Parties would
21 benefit from more than 15 pages in moving for and opposing dismissal.

22 3. The Parties agree, subject to the Court's approval, that the Parties may file briefs of
23 the following length:

24 a. Defendants' motion to dismiss: 24 pages.

25 b. Plaintiffs' response to motion to dismiss: 24 pages.

26 c. Defendants' reply in support of motion to dismiss: 12 pages.

STIPULATED MOTION AND ORDER FOR OVERLENGTH
BRIEFING ON DEFENDANTS' MOTION TO DISMISS - 1
CASE NO. 2:24-cv-00850-BJR

SUMMIT LAW GROUP, PLLC
315 FIFTH AVENUE SOUTH, SUITE 1000
SEATTLE, WASHINGTON 98104-2682
Telephone 206.676.7000
Fax 206.676.7001

1
2 IT IS SO STIPULATED.
3
4

5 DATED this 9th day of August, 2024.
6
7

8 SCHEXNAYDRE LAW FIRM
9
10

11 By: s/
12 David J. Schexnaydre, T.A.
13 Texas Bar Roll #24076142
14 SDTX Federal ID No.: 3845089
15 2895 Highway 190, Suite 212
16 Mandeville, Louisiana 70471
17 (985) 292-2020
18 david@schexnaydre.com
19
20 Counsel for Plaintiffs

21 By: s/
22 Charice Holtsclaw, Esq.
23 WSBA# 53850
24 301 Prospect St.
25 Bellingham, WA 98225
26 (816) 842-6700
holtsclaw.law@gmail.com
Local Counsel for Plaintiffs

27 CITY OF BELLINGHAM
28
29

30 By: s/ Michael E. Good (with permission)
31 Michael E. Good, WSBA #44857
32 Sarah W. Chaplin, WSBA #51642
33 210 Lottie Street
34 Bellingham, WA 98225
35 Phone: (360) 778-8270
36 megood@cob.org
37 swchaplin@cob.org
38
39 Counsel for Defendants

40 SUMMIT LAW GROUP PLLC
41
42

43 By: s/ Shannon E. Phillips
44 Shannon E. Phillips, WSBA #25631
45 Jesse L. Taylor, WSBA #51603
46 Vanessa Williams-Hall, WSBA #54308
47 315 5th Avenue S., Suite 1000
48 Seattle, WA 98104
49 Phone: (206) 676-7000
50 shannonp@summitlaw.com
51 jessel@summitlaw.com
52 vanessaw@summitlaw.com
53
54 Counsel for Defendants

ORDER

1. Pursuant to the stipulation, IT IS SO ORDERED. The Parties may file briefs of the following length:

- a. Defendants' motion to dismiss: 24 pages.
 - b. Plaintiffs' response to motion to dismiss: 24 pages.
 - c. Defendants' reply in support of motion to dismiss: 12 pages.

SO ORDERED.

DATED this 15th day of August, 2024.

Barbara Jacobs Rothstein
Barbara Jacobs Rothstein
U.S. District Court Judge

STIPULATED MOTION AND ORDER FOR OVERLENGTH
BRIEFING ON DEFENDANTS' MOTION TO DISMISS - 3
CASE NO. 2:24-cv-00850-BJR

SUMMIT LAW GROUP, PLLC
315 FIFTH AVENUE SOUTH, SUITE 1000
SEATTLE, WASHINGTON 98104-2682
Telephone 206.676.7000
Fax 206.676.7001